

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID ALLEN GAUNT,
[DOB: 8-9-1967]

Defendant.

No. 25-03017-01-CR-S-BCW

COUNTS 1 and 2

18 U.S.C. § 933(a)(1)

18 U.S.C. § 933(a)(2)

18 U.S.C. § 933(a)(3)

18 U.S.C. § 933(b)

NMT 15 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNT 3

18 U.S.C. §§ 922(g)(3) and 924(a)(8)

NMT 15 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNTS 4, 5, 6, and 7

18 U.S.C. §§ 922(a)(6) and 924(a)(2)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNTS 8 and 10

21 U.S.C. §§ 841(a)(1) and (b)(1)(C)

NMT 20 Years Imprisonment

NMT \$1,000,000 Fine

NLT 3 Years Supervised Release

Class C Felony

COUNTS 9, 11, 13, and 15

18 U.S.C. § 924(c)(1)(A)

NLT 5 Years Imprisonment

Consecutive to All Counts

NMT Life Imprisonment

NMT \$250,000 Fine

NMT 5 Years Supervised Release

Class A Felony

COUNTS 12, 14, and 16

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 Years Imprisonment

NMT \$5,000,000 Fine

NLT 4 Years Supervised Release

Class B Felony

\$100 Special Assessment (Each Count of Conviction)

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

Beginning on an unknown date, but as early as June 21, 2023, and continuing through January 23, 2025, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **DAVID ALLEN GAUNT**, did knowingly conspire and agree with persons known and unknown to the grand jurors to ship, transport, transfer, cause to be transported, or otherwise dispose of one or more firearms, including, but not limited to the following:

1. A Kalashnikov pistol bearing serial number K9P0013844;
2. A Century Arms pistol bearing serial number T0624-21CE03298;
3. A Tokarev shotgun bearing serial number 52-H23YB-007773;
4. A Canik pistol, bearing serial number 21CB32295; and
5. A HS Produkt pistol bearing serial number S3532983,

to another person, in and affecting interstate and foreign commerce, knowing or having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), all in violation of Title 18, United States Code, Sections 933(a)(3) and (b).

COUNT 2

Beginning on an unknown date, but as early as June 21, 2023, and continuing through January 23, 2025, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **DAVID ALLEN GAUNT**, did ship, transport, transfer, cause to be transported, or other dispose of one or more firearms, including, but not limited to the following:

1. A Kalashnikov pistol bearing serial number K9P0013844;
2. A Century Arms pistol bearing serial number T0624-21CE03298;
3. A Tokarev shotgun bearing serial number 52-H23YB-007773;
4. A Canik pistol, bearing serial number 21CB32295; and
5. A HS Produkt pistol bearing serial number S3532983,

to another person, in and affecting interstate and foreign commerce, knowing or having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony (as defined in section 932(a)), all in violation of Title 18, United States Code, Sections 933(a)(1) and (b).

COUNT 3

Beginning on an unknown date, but as early as April 25, 2023, and continuing through January 23, 2025, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **DAVID ALLEN GAUNT**, knowing that he was an unlawful user of a controlled substance as defined in 21 U.S.C. § 802, knowingly possessed one or more firearms, including, but not limited to the following:

1. A Kalashnikov pistol bearing serial number K9P0013844;
2. A Century Arms pistol bearing serial number T0624-21CE03298;

3. A Tokarev shotgun bearing serial number 52-H23YB-007773;
4. A Canik pistol, bearing serial number 21CB32295;
5. A HS Produkt pistol bearing serial number S3532983;
6. A Canik pistol bearing serial number 22CB17439;
7. A Kimber revolver bearing serial number RV095636;
8. A Landor Arms shotgun bearing serial number BPX10980;
9. A Smith and Wesson pistol bearing serial number JLF7962;
10. A Walther pistol bearing serial number AX8226;
11. An Armscor pistol bearing serial number CIT031035;
12. A Taurus pistol bearing serial number TKY87579;
13. A Taurus pistol bearing serial number TKU86217;
14. A Ruger pistol bearing serial number 350127138; and
15. A Sig Sauer pistol bearing serial number 66B987940,

which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(8).

COUNT 4

On or about April 25, 2023, within Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, in connection with the acquisition of a firearm, a Canik pistol, bearing serial number 21CB32295, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to a licensed dealer of firearms, which statement was intended and likely to deceive a licensed dealer of firearms, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a

Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was not an unlawful user of, or addicted to marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance, when in fact as the defendant then knew that he was an unlawful user of, or addicted to marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 5

On or about June 16, 2023, within Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, in connection with the acquisition of firearms, a Kalashnikov pistol bearing serial number K9P0013844, and a Century Arms pistol bearing serial number T0624-21CE03298, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to a licensed dealer of firearms, which statement was intended and likely to deceive a licensed dealer of firearms, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was not an unlawful user of, or addicted to marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance, when in fact as the defendant then knew that he was an unlawful user of, or addicted to marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 6

On or about August 3, 2023, within Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, in connection with the acquisition of a firearm, a Kimber revolver bearing serial number RV095636, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to a licensed dealer of firearms, which statement was intended and likely to deceive a licensed dealer of firearms, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was not an unlawful user of, or addicted to marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance, when in fact as the defendant then knew that he was an unlawful user of, or addicted to marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 7

On or about August 15, 2023, within Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, in connection with the acquisition of a firearm, a Landor Arms shotgun bearing serial number BPX10980, from a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement, to a licensed dealer of firearms, which statement was intended and likely to deceive a licensed dealer of firearms, as to a fact material to the lawfulness of such acquisition of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that that he was not an unlawful user of, or addicted to

marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance, when in fact as the defendant then knew that he was an unlawful user of, or addicted to marijuana or any depressant, stimulant, narcotic drug, or any other controlled substance, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 8

On or about July 11, 2023, in Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, knowingly and intentionally possessed with intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 9

On or about July 11, 2023, in Greene County, in the Western District of Missouri, the defendant, **DAVD ALLEN GAUNT**, did knowingly possess a firearm, that is, that is, a Canik pistol bearing serial number 22CB17439, in furtherance of a drug trafficking crime, that is, possession with intent to distribute methamphetamine as charged in Count 8, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 10

On or about August 16, 2023, in Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, knowingly and intentionally possessed with intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 11

On or about August 16, 2023, in Greene County, in the Western District of Missouri, the defendant, **DAVD ALLEN GAUNT**, did knowingly possess firearms, that is, (1) Kimber revolver bearing serial number RV095636; (2) A Landor Arms shotgun bearing serial number BPX10980; (3) a Smith and Wesson pistol bearing serial number JLF7962; (4) a Walther pistol bearing serial number AX8226; (5) an Armscor pistol bearing serial number CIT031035; and (6) a Taurus pistol bearing serial number TKY87579, in furtherance of a drug trafficking crime, that is, possession with intent to distribute methamphetamine as charged in Count 10, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 12

On or about November 7, 2023, in Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, knowingly and intentionally possessed with intent to distribute, 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 13

On or about November 7, 2023, in Greene County, in the Western District of Missouri, the defendant, **DAVD ALLEN GAUNT**, did knowingly possess a firearm, that is, a Taurus pistol bearing serial number TKU86217, in furtherance of a drug trafficking crime, that is, possession with intent to distribute methamphetamine as charged in Count 12, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 14

On or about October 15, 2024, in Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, knowingly and intentionally possessed with intent to distribute, 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 15

On or about October 15, 2024, in Greene County, in the Western District of Missouri, the defendant, **DAVD ALLEN GAUNT**, did knowingly possess a firearm, that is, a Ruger pistol bearing serial number 350127138, in furtherance of a drug trafficking crime, that is, possession with intent to distribute methamphetamine as charged in Count 14, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 16

On or about December 4, 2024, in Greene County, in the Western District of Missouri, the defendant, **DAVID ALLEN GAUNT**, did knowingly and intentionally distributed 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code Sections 841(a)(1) and (b)(1)(B).

A TRUE BILL.

/s/Stephanie L. Wan
STEPHANIE L. WAN
Assistant United States Attorney
Missouri Bar #58918
Dated: February 4, 2025
Kansas City, Missouri

SIGNATURE ON FILE WITH USAO
FOREPERSON OF THE GRAND JURY